

Regulatory Inspections Standard Operating Procedure

REFUSE DISPOSAL DIVISION

Divisional

Regulatory inspections occur at each of our sites at least quarterly (monthly at the active Miramar Landfill). The Local Enforcement Agency (LEA) and Regional Water Quality Control Board (RWQCB) are the usual Regulatory agencies that inspect our sites. Additional inspections may be performed during other maintenance and monitoring activities, such as during the LFG surface emissions walk through and monitoring of drainage facilities. (A written compliance report noting results of the inspection by the inspector is generally prepared and distributed to staff.) Below are some general rules for all inspections:

Guidelines:

- 1. Designate time/place to meet the inspector and *be on time*. Be prepared to walk the entire site (boots, hat, etc.), if so desired by the inspector. Take notebook and clipboard to document problem area(s) and location(s). A hand-held GPS unit is available to relocate identified areas in the future.
- 2. Let the inspector take the lead. Some things the inspector may look at include the *surface cover* and *slopes for evidence of cracking*, *subsidence*, *erosion*, *exposed trash*, *leachate seeps*, *ponding* and any other condition that threatens the integrity of the cover. The condition of roadways, fences, vegetation, erosion control measures, drainage ditches, pipes and the presence of litter and/or illegal dumps are to be noted if corrective action is required.
- 3. Be courteous and polite with inspector(s). Be sure to let them know of any maintenance activities that have occurred at the site since their last inspection. Also let them know how any pending violations were corrected. Respond to all questions raised by the inspector during the inspection. If the answer is unknown, offer to provide the information at a later date. Discuss all questionable requests for information with your Supervisor before transmitting.
- 4. Show inspector all areas and records requested. Don't feel it is your responsibility to point out things that you may be currently unhappy with at the site. Doing so may bring an unnecessary urgency to a work item pre-empting a potentially more important problem. If a violation is warranted, the inspector will issue one (it's their job).
- 5. At the inactive sites, the ESD representative shall fill out a *Quarterly Site Inspection* form required by Board Order 97-11 for inclusion into quarterly groundwater reports (EMS Document Control No. RDD-F-GW-01). This will preclude a second trip to the site later in the quarter to inspect the same facilities.

Effective Date: February 17, 2004



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Benefit of Compliance to Instruction:

- Maintain professional, courteous relationship with the Regulator
- Keep apprised of areas of concern
- Minimize impact to the environment

Consequence of Non-Compliance to Instruction:

- Possible violations and/or fines from Regulatory Agency
- Difficult working relationship with Regulatory Agency
- Potential for embarrassment to the Department
- Eroded confidence in the staff's ability to meet Regulatory requirements
- Disciplinary action for improper conduct

Environmental Management System (EMS) – ISO 14001

Process Map #: DO-1.0

Reviewed by: Senior Staff

Approved by: Steven F. Fontana, Deputy Environmental Services Director, Refuse Disposal

The on-line version and secured hardcopy are the controlled documents. The secured hardcopy will be identified by a "Controlled Copy" stamp (in red) and RDD Deputy Director signature. Any other documents are uncontrolled. Verify revision level status on-line or contact the EMR.

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